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10 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

11 LOS ANGELES PRESS CLUB,
12 STATUS COUP,

13 Plaintiffs,

14 vs.

15 CITY OF LOS ANGELES, a municipal
16 entity, JIM MCDONNELL, LAPD
17 CHIEF, sued in his official capacity;

18 Defendants.
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CASE NO. 25-CV-05423 HDV-E
DEFENDANT CITY OF LOS
ANGELES'S OBJECTION TO
PLAINTIFFS'S NOTICE OF
RELATED CASES (Local Rule 83-
1.3.3)

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21 Pursuant to L.R. 83-1.3.3., Defendant City of Los Angeles objects to the Notice of
22 Related Cases filed by Plaintiffs. As a preliminary matter, Plaintiffs' Notice cites cases
23 on the active calendars of the Hon. Consuelo Marshall *and* the Hon. Hernan Vera that are
24 in very different phases of litigation. The reason these cases are not before the same
25 judge is that they are not related pursuant to L.R. 83-1.3.

26 While LAPD policies may be at issue in this case (and the others), the cases do not
27 arise out of the same transactions or happenings, and they occurred on different dates and
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different locations. Every police action, in response to a protest or otherwise, is unique and courts must judge them on the individual facts presented in each case.

“In evaluating the government’s interest in the use of force we look to: (1) the severity of the crime at issue, (2) whether the suspect posed an immediate threat to the safety of the officers or others, and (3) whether the suspect was actively resisting arrest or attempting to evade arrest by flight. However, our inquiry is not limited to these factors. Rather, recognizing that the facts and circumstances of every excessive force case will vary widely, our ultimate inquiry addresses whether the totality of the circumstances justifies a particular sort of seizure.” *Young v. County of L.A.*, 655 F.3d 1156, 1163 (9th Cir. 2011) (citations omitted).

Accordingly, the cases are not related pursuant to L.R. 83-1.3. By definition, they do not call for determination of substantially related questions of law and fact, at least on any practical level. A factfinder will determine whether police officers violated the constitutional rights of a plaintiff on the evidence and facts presented in each individual case, regarding each individual plaintiff’s situation. For this reason, considerations of judicial economy do not weigh in favor of relating the cases and relation of all these cases will actually delay and unnecessarily complicate the issues presented in the litigation.

By filing this objection, Defendant City of Los Angeles is not waiving formal service of process.

Date: June 18, 2025

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By: /s/ Cory M. Brente

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